Exhibit A6 Email invitation from Ms. Owens to Mr. Neilson for February 16, 2018 regarding the HUBB filing certification

Michelle Owens

Subject:

HUBB - Filings Ready for Certification - Due March 1, 2018

Location:

Aaron's Office

Start: End: Fri 2/16/2018 2:00 PM Fri 2/16/2018 2:30 PM

Recurrence:

(none)

Meeting Status:

Meeting organizer

Organizer:

Michelle Owens

Required Attendees:

Aaron Neilson

Hi Aaron,

Jared, Jordan, Corey and Melanie are done providing files for this HUBB filing. All files are now error and warning free and ready for certification. This meeting is to discuss and certify if you are ready.

Thank you, Michelle

Exhibit A7 Affidavits of Aaron Neilson and Michelle Owens

STATE OF MONTANA)
)
COUNTY OF MISSOULA)

Affidavit of Aaron M. Neilson

Aaron M. Neilson ("Affiant"), having first been duly sworn, states as follows:

- 1. Affiant is currently an attorney working for Christian Samson, PLLC, a law firm in Missoula, Montana; however, at the time period covered in the statements of this affidavit, Affiant was Vice President-General Counsel for Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (collectively "Blackfoot").
- 2. Affiant has read the foregoing letter of appeal ("Appeal") to the Universal Service Administrative Company ("USAC") regarding a dispute by Blackfoot of the reduction in Alternative Connect America Cost Model ("A-CAM") funding issued by USAC, related to Blackfoot's certification of locations filed in the High Cost Universal Broadband ("HUBB") system for 2017 deployments.
- 3. In support of the Appeal, Affiant further states that on February 16, 2018, he met with Michelle Owens, who is a Regulatory Specialist/Paralegal for Blackfoot, in the Affiant's office at 2:00 pm, Mountain Time ("February 16 Meeting"), regarding certification of the 475 broadband locations that had been previously uploaded into the HUBB system ("Certification").
- 4. During the February 16 Meeting, Affiant logged into USAC's e-file and HUBB systems in order to perform the Certification with Ms. Owens present and observing. Affiant checked the box that was required to certify all locations at one time. Affiant submitted the Certification and observed that a confirmation screen popped up. Anticipating that USAC's e-file and HUBB systems would send an email confirming the certification, Affiant did not print the HUBB confirmation screen and did not write down the confirmation number that was included in the confirmation screen.
- 5. After learning from Ms. Owens on or about March 7, 2018 that the Certification made on February 16, 2018 was not showing up in USAC's HUBB system, Affiant logged back into the e-file system on March 7, 2018, but Affiant no longer had access to USAC's HUBB system.
- 6. After Ms. Owens worked with USAC to restore Affiant's access to the HUBB system and Affiant's entitlements for certifying in the HUBB system on March 8, 2018, Affiant logged into the e-file and HUBB systems on March 8, 2018 in order to make and resubmit the Certification, which Affiant did in groups of ten (10) broadband locations at a time until all 475 broadband locations had been certified. Affiant captured screen shots of all the certifications made that day.

7. Affiant did not receive an email confirmation from USAC regarding the Certification of broadband locations made in the HUBB system on February 16, 2018, and Affiant did not receive an email confirmation of the re-submission of the Certification made in the HUBB system on March 8, 2018.

The statements herein and in the Appeal are true and accurate to the best of Affiant's information, knowledge, and belief. Further Affiant sayeth not.

Aaron M. Neilson

Former VP-General Counsel for Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co.

Sworn and Subscribed to before me this _______day of April, 2019, to certify which witness my hand.

Notary Public in and for the State of

My Commission expires on: 6/20/20



STATE OF MONTANA)
)
COUNTY OF MISSOULA)

Affidavit of Michelle Owens

Michelle Owens ("Affiant"), having first been duly sworn, states as follows:

- 1. Affiant is a Regulatory Specialist/Paralegal for Blackfoot Telephone Cooperative, Inc. and Fremont Telcom Co. (collectively "Blackfoot").
- 2. Affiant has read the foregoing letter of appeal ("Appeal") to the Universal Service Administrative Company ("USAC") regarding a dispute by Blackfoot of the reduction in Alternative Connect America Cost Model ("A-CAM") funding issued by USAC, related to Blackfoot's certification of locations filed in the High Cost Universal Broadband ("HUBB") system for 2017 deployments.
- 3. In support of the Appeal, Affiant further states that on February 16, 2018, she met with Aaron M. Neilson, who was VP-General Counsel of Blackfoot at that time, in his office at 2:00 pm, Mountain Time ("February 16 Meeting"), regarding certification of the 475 broadband locations that had been previously uploaded into the HUBB system ("Certification").
- 4. During the February 16 Meeting, Affiant observed Mr. Neilson log into USAC's e-file and HUBB systems in order to perform the Certification. Affiant also observed Mr. Neilson check the box that was required to certify all locations at one time. Affiant further observed Mr. Neilson submit the Certification. Affiant observed that a confirmation screen popped up following Mr. Neilson's submission of the Certification. Affiant affirms that Mr. Neilson did not print the HUBB confirmation screen, and that neither she nor Mr. Neilson wrote down the confirmation number that was included in the confirmation screen.
- 5. After Affiant learned from USAC that the Certification made on February 16, 2018 was not showing up in USAC's HUBB system and after Affiant learned that Mr. Neilson no longer had access to USAC's HUBB system, Affiant worked with USAC on March 7 and 8, 2018 to restore Mr. Neilson's access to the HUBB system and Mr. Neilson's entitlements for certifying in the HUBB system. On March 8, 2018, Affiant notified Mr. Neilson that his access to the HUBB system and his entitlements in that system had been restored so that he could re-submit the Certification.
- 6. Affiant did not receive an email confirmation from USAC regarding the Certification of broadband locations made by Mr. Neilson in the HUBB system on February 16, 2018 or for the resubmission of the Certification in the HUBB system made by Mr. Neilson on

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March 8, 2018. Affiant has also not received any email confirmations for any subsequent filings or certifications made in the HUBB system in 2019.

The statements herein and in the Appeal are true and accurate to the best of Affiant's information, knowledge, and belief. Further Affiant sayeth not.

Regulatory Specialist/Paralegal

Sworn and Subscribed to before me this 22 day of April, 2019, to certify which witness my

hand.

JEREMY L REED NOTARY PUBLIC for the State of Montana Residing at Florence, MT My Commission Expires June 21, 2021.

otary Public in and for the State of MT

My Commission expires on.

Exhibit A8 March 1, 2018 Email cancellation of March 1, 2018 HUBB filing reminder

Michelle Owens

Subject:

Canceled: HUBB Filing - Due March 1, 2018

Location:

DEADLINE TICKLER

Start: End: Thu 3/1/2018 9:00 AM Thu 3/1/2018 9:30 AM

Show Time As:

Free

Recurrence:

(none)

Meeting Status:

Not yet responded

Organizer:

Michelle Owens

Required Attendees:

Aaron Neilson

Importance:

High

Cancelling since we finished this last week.

Exhibit A9 March 1, 2018 Email from Michelle Owens to Aaron Neilson

Michelle Owens

From:

Michelle Owens

Sent:

Thursday, March 01, 2018 4:40 PM

To: Cc: Aaron Neilson Michelle Owens

Subject:

Check-in Materials - 3/2/18

Hi Aaron,

For our check-in meeting, here is my focus for the next two weeks:

- Compliance
 - o FCC Form 497 Lifeline Monthly Report Due 3/8/18
 - Section 255 Disability Accessibility Recordkeeping Certification Due 3/15/18
 - o FCC Form 499A Due 4/1/18 Pending Audited Financials
 - Annual Tariff Filing Interstate Initial Data Request Due to JSI 3/30/18
 - NPSC Affidavit and Contact Information Due 4/30/18
 - South Dakota Outage Contacts Due 5/1/18
 - Section 64.1900 Geographic Rate Averaging and Integration certification Due 5/1/18
- Lifeline
 - o Address E-file issues.
 - o Speak with USAC regarding officer and user roles and 498 filing.
 - o Pull together back-office query to work on the next 497 filing.
- Tariff related disputes
- Tariff 4 Access
- Idaho Contacts Updated
- 2018 Filing set up
- MPSC ETC NOI Hearing FCC Deployment Report
- FUSC GCID Audit
- Transparency Requirements In progress

Internship -

- ACAM In progress
- Red Flag

- Schools & Libraries Self-build focus
- Rural Health
- Lifeline
- TSP
- **Disability Access**
- Robocall
- Do Not Call

Items completed during the past two weeks:

- Compliance
 - Red Flag Report
 - FCC Form 477
 - HUBB Filing
 - Section 64.2009 CPNI Compliance Certification
 - o CALEA Manual
- Lifeline
 - o Transition in progress from RA.
- Lifeline Memo review

Michelle Owens

Regulatory Specialist



Blackfoot 1221 North Russell Street Missoula, MT 59808 V: 406-541-5131 F: 406-541-5144

Stay connected with Blackfoot:

www.blackfoot.com











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Exhibit A10 Email from Aaron Neilson to Michelle Owens with attachment of screen shot of the USAC e-file access for Aaron Neilson showing that HUBB access was missing

Michelle Owens

From: Aaron Neilson

Sent: Wednesday, March 07, 2018 8:18 AM

To: Michelle Owens
Subject: USAC Snippit
Attachments: SnipImage.JPG



Information Center

- Service Providers - View Sent Remittance Emails

- Schools and Libraries

- 472 Online Bear

-473 SPAC - Online Item 21

- Rural Health Care

- Invoice - Form 463

High Cost & Loy Income

- Form 497

Form 555 - 525 Online Form

481 Online Form

- 690 Online Form

- 64.314 Certifications **Pending Certifications**

- Form 499Q

- Form 499A

Download Forms

Authorized Users

- New User - Add or Remove 498 Users

- Pending Users

My Account

- Edit User Profile

- Change Password

FAQs

- General E-File FAQs

- E-Certification FAQs - E-File Form 498 FAQs

- E-File Form 499 FAQs - E-File User Guide

Terms and Conditions

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To revise or deactivate a Form 498 ID, or to consolidate multiple SPINs, click the "Form 498 ID Activity" button for appropriate Form 498 ID.

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Form 498 ID	Company Name	Form 498 ID Status	Action					
143018518	Blackfoot Communications, Inc.	Active	Form 498 ID Activity for 143018518					
143002531	Blackfoot Telephone Cooperativ	Active	Form 498 ID Activity for 143002531					
143002515	Fremont Telcom, Co.	Active	Form 498 ID Activity for 143002515					

Form 498 ID	Company Name	Tax ID	
143002515	Fremont Telcom, Co.	880326099	[entitlements] [Deactivate]
143002531	Blackfoot Telephone Cooperativ	810251379	[entitlements] [Deactivate]
143018518	Blackfoot Communications, Inc.	810499119	[entitlements] [Deactivate]

Form 498 ID	Company Name	Tax ID	
143002515	Fremont Telcom, Co.	880326099	[entitlements] [Deactivate]
143002531	Blackfoot Telephone Cooperativ	810251379	[entitlements] [Deactivate]
143018518	Blackfoot Communications, Inc.	810499119	[entitlements] [Deactivate]

Form 498 ID	Company Name	Tax ID	
143002515	Fremont Telcom, Co.	880326099	[entitlements] [agents] [Deactivate]
143002531	Blackfoot Telephone Cooperativ	810251379	[entitlements] [agents] [Deactivate]
143018518	Blackfoot Communications, Inc	810499119	[entitlements] [agents] [Deactivate]

	Authorized Users			100				
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1	No Records Found.							

Welcome Aaron Neilson My Account Log Out

General E-File FAQ's
 E-Certification FAQ's

E-File Form 498 FAQ's

 E-File Form 499 FAQ's E-File User Guide